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ECONOMIC AND ENVIRONMENTAL QUESTIONS:
SUSTAINABLE DEVELOPMENT

Letter dated 29 April 1996 from the Director-General of the International Air Transport Association to the Secretary-General

I refer to the letter dated 21 July 1995 from the Secretary-General of the International Maritime Organization (IMO) to the Secretary-General of the United Nations (E/1996/15).

The International Air Transport Association (IATA) represents over 230 airlines from about 140 countries. These airlines transport dangerous goods on a daily basis, and IATA therefore considers the carriage of dangerous goods an issue of extreme importance.

IATA fully supports the work of the United Nations Committee of Experts on the Safe Transport of Dangerous Goods. The effective functioning of the regulatory process depends on implementation of the required changes quickly and efficiently. IATA therefore believes that the current two-year publication cycle for the Recommendations on the Transport of Dangerous Goods, 1/ known as the "United Nations Orange Book", is essential for maintaining flexibility and improving safety.

Under the present process, a proposal to the Committee takes up to two years to be adopted and a minimum of two more years to be implemented by the various transport modes. The shipping industry has indicated that the current system is sometimes too slow to react to its needs. Changing the publication

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cycle from two to four years, as proposed, could result in delays of up to eight years before changes are implemented by all transport modes. Under such conditions, the various modal transport organizations will find themselves under industry pressure to implement changes unilaterally. This would result in the disintegration of all of the valuable work that has been done by the Committee towards producing a harmonized regulatory structure for all transport modes.

IATA feels strongly that lack of compliance with regulations, as mentioned in the IMO letter, is not a valid reason to delay implementation of required changes. Through the International Civil Aviation Organization (ICAO) and IATA, the air mode implements the Recommendations quickly, faithfully and globally, using proactive training, awareness and enforcement. The air mode's success is the result of close cooperation between the Committee, ICAO, IATA, industry and national Governments.

The Committee (in December 1994), ICAO (in October 1995), IATA and other organizations representing the industry have clearly stated their strong support for maintaining the two-year publication cycle for the Recommendations. The benefits of maintaining this periodicity, and the grave negative consequences of a change to four years, must be seriously considered. I would therefore appreciate IATA's position, and the issues raised here, being brought to the attention of the Economic and Social Council at its substantive session of 1996.

(Signed) Pierre J. JEANNIOT
Director-General

Notes

1/ The Recommendations are based on those originally prepared by the United Nations Committee of Experts on the Transport of Dangerous Goods (ST/ECA/43-E/CN.2/170) considered by the Economic and Social Council at its twenty-third session (resolution 645 G (XXIII) of 26 April 1957). The Recommendations have been amended and updated by succeeding sessions of the Committee of Experts and published in accordance with subsequent resolutions of the Economic and Social Council. The current ninth revised edition (United Nations publication, Sales No. E.95.VIII.1) includes the recommendations adopted at the eighteenth session of the Committee held in Geneva from 28 November to 7 December 1994.